


CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
ABILENE DIVISION

DEPUTY CLERK 

UNITED STATES OF AMERICA

v.

NO. 1:18-CR-054-C(03)

ROBERT EVANS RENO (3)

**FACTUAL RESUME**

In support of Robert Evans Reno's plea of guilty to the offense in Count One of the indictment, Reno, the defendant, David Sloan, the defendant's attorney, and the United States of America (the government) stipulate and agree to the following:

**ELEMENTS OF THE OFFENSE**

To prove the offense alleged in Count One of the indictment, charging a violation of 21 U.S.C. § 846, that is, Conspiracy to Distribute and Possess with Intent to Distribute 50 Grams or More of Methamphetamine, the government must prove each of the following elements beyond a reasonable doubt:<sup>1</sup>

- First.* That two or more persons, directly or indirectly, reached an agreement to distribute or to possess with the intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance;
- Second.* That the defendant knew of the unlawful purpose of the agreement;
- Third.* That the defendant joined in the agreement willfully, that is, with the intent to further the unlawful purpose; and

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<sup>1</sup> Fifth Circuit Pattern Jury Instruction 2.95 (5th Cir. 2015).

*Fourth.* That the overall scope of the conspiracy involved 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

**STIPULATED FACTS**

1. Robert Evans Reno (Reno) admits and agrees that beginning on or about a date unknown to the grand jury and continuing to on or about August 8, 2018, within the Northern District of Texas, Abilene Division, and elsewhere, he knowingly and willfully combined, conspired, confederated, and agreed with persons known and unknown to distribute and possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance. In violation of Title 21, United States Code, Section 846.

2. On February 6, 2018, a Texas Department of Public Safety (TX DPS) trooper stopped a white Chevrolet truck approximately three miles east of Clyde, Texas, in the Abilene Division of the Northern District of Texas, for speeding. The driver and sole occupant of the truck was identified as Mayra Yurivia Reyes. A narcotics detection canine alerted to the odor of a controlled substance in the truck. In the console of the truck, the trooper found a blue bag inside a Rubbermaid container that contained 127.5 net grams of d-methamphetamine with 100% purity. In the back seat, the trooper located a 9mm Springfield pistol loaded with 15 rounds of ammunition.

3. On February 12, 2018, Brandy Siobhan Wright was interviewed and Wright stated that she knew Reyes and that she obtained methamphetamine from Reyes for \$500 per ounce. Wright stated that in December 2017, Reyes brought seven ounces of

methamphetamine to Abilene and distributed it. Wright stated that about one month later, Reyes returned with four ounces of methamphetamine that were already pre-sold and returned again at a later unknown date with five ounces of methamphetamine and sold it for \$500 per ounce. In a subsequent interview, Wright stated that between December 2017 and February 2018, Reyes supplied approximately 22 ounces of methamphetamine to Wright, Robert Reno, and Nelda Thomas.

4. On March 5, 2018, investigators interviewed Robert Evans Reno. Reno admitted to purchasing quarter-ounces of methamphetamine about a year ago from Erin Brown, a/k/a Erin Smolin.


5. On May 1, 2018, Reno was interviewed again and stated that he had obtained two ounces of methamphetamine from Mayra Reyes two or three times between December 2017 and February 2018. Reno stated that he paid Reyes \$550 per ounce and that he sold in smaller quantities of one gram to one-half of an ounce. Reno said that he used Facebook Messenger to conduct his drug deals.


6. Reno admits that he, Reyes, Wright, and others, known and unknown, directly or indirectly, reached an agreement to distribute or to possess with the intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance. Reno admits that he knew of the unlawful purpose of the agreement and that he joined in the agreement willfully, that is, with the intent to further the unlawful purpose. Reno admits that the overall scope of the conspiracy involved 50 grams or more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

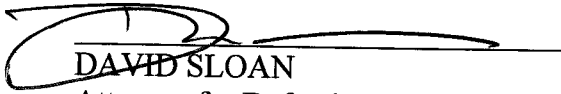
6. Robert Evans Reno agrees that <sup>he</sup>~~she~~ committed all the essential elements of the offense. This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Count One of the indictment.

AGREED TO AND STIPULATED on this 18 day of SEPTEMBER, 2018.

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